

*Before the Federal Communications Commission
Washington, D.C. 20554*

In the Matter of:)	
)	
Advanced Television Services and)	MB Docket No. 87-268
Their Impact upon the Existing)	
Television Broadcast Service)	

Directed to: The Commission

ERRATUM

Evangelistic Alaska Missionary Fellowship, Inc. ("Evangelistic Alaska"), licensee of KJNP-TV and permittee of KJNP-DT, North Pole, Alaska, by its attorneys, hereby respectfully submits its Erratum to its "Comments and Request for Alternative Channel Designation" in the above-captioned proceeding, filed January 19, 2007.

Counsel for Evangelistic Alaska has realized that the Engineering Statement referenced in the "Comments and Request for Alternative Channel Designation" inadvertently was not attached to the electronic file submitted to the Commission through its Electronic Comment Filing System ("ECFS"). Accordingly, that Engineering Statement is being submitted herewith, attached to a copy of the "Comments and Request for Alternative Channel Designation" as originally filed.

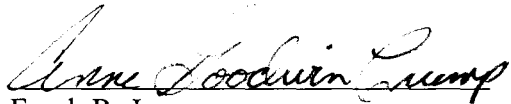
Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 N. 17th Street
Eleventh Floor
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January 26, 2007

EVANGELISTIC ALASKA MISSIONARY
FELLOWSHIP, INC.

By:



Frank R. Jazzo

Anne Goodwin Crump

Its Attorneys

*Before the Federal Communications Commission
Washington, D.C. 20554*

In the Matter of:)	
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Advanced Television Services and)	MB Docket No. 87-268
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COMMENTS AND REQUEST FOR ALTERNATIVE CHANNEL DESIGNATION

Evangelistic Alaska Missionary Fellowship, Inc. ("Evangelistic Alaska"), licensee of KJNP-TV and permittee of KJNP-DT, North Pole, Alaska, by its attorneys, hereby respectfully submits its Comments and Request for Alternative Channel Designation in response to the Commission's *Seventh Further Notice of Proposed Rule Making*, FCC 06-150, released October 20, 2006 ("*SFNPRM*"). With respect thereto, the following is stated:

1. KJNP-TV is licensed to operate on Channel 4, and it was initially assigned Channel 20 as its companion DTV channel. Pursuant to the *SFNPRM*, KJNP-DT was assigned Channel 4 as its Tentative Channel Designation ("TCD") for post-transition operation. In accordance with the procedures outlined in Paragraph 25 of the *SFNPRM*, however, in light of the status of KJNP-DT's TCD as a low-band VHF channel, Evangelistic Alaska is now seeking the designation of Channel 20 for KJNP-DT as set forth in the attached Engineering Statement. This alternative channel designation would serve the public interest by allowing KJNP-DT to provide improved service to the public.

2. The special circumstances of KJNP-TV have made the DTV transition particularly difficult for the station. KJNP-TV is a small, independent station located in Alaska, outside of

any of the major cities there. While KJNP-TV is licensed as a commercial television station and does air some advertising, it operates on a largely noncommercial basis with volunteer staff members. Thus, its financial resources are quite limited, and even at the time that it filed its Pre-Election Certification Form (FCC Form 381), File No. BCERCT-20041103AAY, Evangelistic Alaska was concerned as to precisely how it would be able to afford constructing the new DTV facility. As a result, KJNP-DT's application for an initial DTV construction permit had specified DTV facilities that would operate with low power. At the time of the Pre-Election Certification, the application for construction permit remained pending, and the digital facilities therefore were not operational. Likewise, at the time of the filing of the station's First Round Election, File No. BFRECT-20050208AEQ, which specified that the station would operate on Channel 4, its current analog channel, the construction permit application was still in pending status.

3. Thereafter, however, significant changes took place. The application for construction permit was granted on February 10, 2005, with an expiration date of August 10, 2006. As the station was beginning to make preparations for construction prior to the deadline, a higher-power transmitter than Evangelistic Alaska had anticipated using was made available to KJNP-DT at a reduced price. Consequently, the station sought and was granted Special Temporary Authority ("STA"), File No. BDSTA-20060214ADK, to operate with a power level greater than that specified in the construction permit, but within the original DTV allotment parameters for the station. The station began operations pursuant to the STA and followed with an application for modification of construction permit to specify the higher-powered facilities authorized by the

STA (File No. BMPCDT-20060609ABY), and that application remains pending.¹

4. In the interim, KJNP-DT has gained experience with the operation of the Channel 20 facilities authorized by the STA, experience which it had not been able to have prior to submission of the Pre-Election Certification or First Round Election. It has found that the facilities now in use provide adequate coverage to the station's community of license and thus has concluded that facilities on that channel with a similar power level and increased height above average terrain will be beneficial for post-transition operation. Evangelistic Alaska is also aware of the significant difficulties encountered by or projected for the operations of other DTV stations on Channel 4 and other low-band VHF channels. Accordingly, in light of the public interest benefits that have been realized through its current Channel 20 operation, Evangelistic Alaska is now seeking Channel 20 as an alternative TCD with the facilities specifications set forth in the attached Engineering Statement.

5. As demonstrated in the attached Engineering Statement, the proposed facilities comply with the Commission's technical rules and policies. While the station is located within the zone which requires Canadian concurrence, in light of the facts that Channel 20 was initially allotted for use by KJNP-DT, and that the facilities proposed are well within those specified at the time of the initial allotment, there should be no issue in this regard. Furthermore, as indicated in the Engineering Statement, no portion of the station's interfering contour will enter Canadian territory.

WHEREFORE, the premises considered, Evangelistic Alaska respectfully requests that

¹ Applications for extension of both the STA and the construction permit have been filed since that time, File No. BEDSTA-20060630AAR and File No. BEPCDT-20060809AHN, and also remain pending.

KJNP-DT be assigned Channel 20 as its TCD in accordance with the attached Engineering Statement.

Respectfully submitted,

EVANGELISTIC ALASKA MISSIONARY
FELLOWSHIP, INC.

By: 
Frank R. Jazzo
Anne Goodwin Crump

Its Attorneys

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Arlington, Virginia 22209
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January 11, 2007

ENGINEERING STATEMENT IN

SUPPORT OF COMMENTS

MB DOCKET 87-268

KJNP-DT - NORTH POLE, AK

Evangelistic Alaska Missionary Fellowship, Inc.
North Pole, AK

January 3, 2007

Prepared for: Ms. Yvonne Carriker
Evangelistic Alaska Missionary
Fellowship, Inc.
Box 56359
North Pole, AK 99705-1359

CARL E. SMITH CONSULTING ENGINEERS

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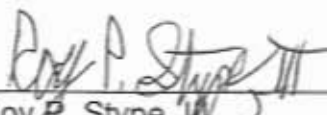
Fig. 1.0 - Proposed KJNP-DT Service Contours

ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)


Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by the Evangelistic Alaska Missionary Fellowship, Inc. to prepare the attached "Engineering Statement In Support of Comments - MB Docket 87-268 - KJNP-DT - North Pole, AK."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me on **January 3, 2007**.



Notary Public

/SEAL/

NANCY A. ADAMS, Notary Public
Residence - Cuyahoga County
State Wide Jurisdiction, Ohio
My Commission Expires Sept. 20, 2010

ENGINEERING STATEMENT

This engineering statement is prepared on behalf of the Evangelistic Alaska Missionary Fellowship, Inc., licensee of KJNP-TV - North Pole, Alaska and permittee of paired DTV station KJNP-DT. It supports comments in response to the *Seventh Further Notice of Proposed Rulemaking* ("FNPRM") in MB Docket 87-268.

Based on filings made as part of the DTV channel election process, this FNPRM proposes to allot Channel 4 for post-transition DTV use by KJNP-TV with a nondirectional¹ effective radiated power of 1 kilowatt at 5 meters above average terrain. As a station which received a tentative channel designation ("TCD") on a low band VHF channel, however, KJNP-DT is eligible, pursuant to Paragraph 25 of this FNPRM, to submit comments requesting the assignment of an alternative post-transition channel. The comments of which this engineering statement is a part request that KJNP-DT be assigned Channel 20, its present DTV channel, for post-transition operation.

Table 1.0 presents a tabulation of the technical facilities specified for this proposed alternate DTV allotment² and Table 1.1 presents the directional pattern which

¹The table in Appendix B of the FNPRM indicates that there is a directional pattern (74432) associated with the proposed Channel 4 post-transition DTV allotment for KJNP-DT. The record for this pattern in the Consolidated Database System ("CDBS"), however, specifies a relative field value of 1.0 in all directions except 110°, where no relative field value has been specified. Since conversations with the FCC staff have determined that the omission of a relative field value on the 110° radial, which occurred in the patterns specified in this table for several post-transition allotments, was the result of an error entering this relative field data into the CDBS, it is obvious that the post-transition allotment proposed for KJNP-TV in this table is based on nondirectional operation.

²These facilities differ from the facilities and site location which were certified for post-transition operation in KJNP-DT's 381 application. Given the isolated nature of the North Pole area and the minimal nature of these proposed alternative operating facilities it does not appear that this modification to the facilities specified for post-transition operation by KJNP-DT would adversely impact or prejudice any other station. If, however, the proposed alternative Channel 20 allotment for KJNP-DT cannot be based on the modified facilities specified in Table 1.0, KJNP-DT is willing to initially accept this alternate channel based on the facilities specified in the pending application (BMPCDT-20060609ABY) to modify the KJNP-DT construction permit to authorize higher power operation from the presently authorized transmitter site.

is associated with this proposed alternate allotment. Figure 1.0 is a map exhibit depicting the predicted 48 dBu (principal community) and 41 dBu (noise limited) contours for these proposed Channel 20 DTV facilities. These contours were projected as outlined in Section 73.625(b) of the FCC Rules utilizing these proposed operating facilities and terrain data extracted from the NGDC 3 second terrain database. As shown in this figure, the proposed 48 dBu contour will encompass all of North Pole, as required by Section 73.625(a) of the FCC Rules.

There are no TV broadcast stations, either analog or DTV, operating on channels requiring protection consideration located close enough to the proposed site to require detailed study to determine if the proposed Channel 20 facilities comply with the applicable protection requirements to other stations. As a result, it is obvious that these proposed DTV facilities fully comply with these protection requirements.

The proposed KJNP-DT site is located within 400 kilometers of the U.S./Canadian border. Thus, it may be necessary to obtain Canadian concurrence for this proposed DTV allotment.³ The predicted 19.5 dBu interfering contour for the proposed facilities, however, will not penetrate Canadian soil. Thus, if further Canadian concurrence is necessary, it does not appear that any major problems should be encountered in obtaining it.

Section 73.623(c)(5) of the FCC Rules also requires that these proposed DTV facilities provide the required protection to Class A TV stations. In this particular case,

³The proposed alternative Channel 20 DTV allotment for KJNP-DT is on the same channel as the original KJNP-DT DTV allotment and specifies the same site and antenna height, but the proposed maximum effective radiated power (15 kilowatts) is substantially less than the nondirectional effective radiated power (213.8 kilowatts) specified for this original allotment. As a result, since Canadian concurrence was already received for the original KJNP-DT allotment facilities, it appears unlikely that further Canadian concurrence would be required for these lesser proposed facilities.

there are no Class A TV stations authorized on a Channel requiring protection consideration which are located close enough to the proposed KJNP-DT site to require protection consideration. Thus, the Channel 20 DTV facilities proposed herein comply with the applicable protection requirements to Class A TV stations.

Based on the data contained in this engineering statement, DTV Channel 20 can be allotted for post-transition use by KJNP-DT utilizing the operating facilities outlined in Table 1.0 while complying with the protection requirements to all other TV broadcast stations, both analog and DTV, requiring protection consideration. These proposed DTV facilities will also provide the required protection to all Class A TV stations.

TABLE 1.0

PROPOSED OPERATING FACILITIES
DTV CHANNEL 20
KJNP-DT - NORTH POLE, AK
Evangelistic Alaska Missionary Fellowship, Inc.
North Pole, AK

Power:	15 kW (11.76 dBk) directional (See Table 1.1 for pattern information)
Antenna Height:	36 m AGL 750 m MSL 485 m AAT
Site Coordinates (NAD27):	NL - 64° 52' 44" WL - 148° 03' 10"

TABLE 1.1

KJNP-DT PROPOSED
DIRECTIONAL PATTERN
 Evangelistic Alaska Missionary Fellowship, Inc.
 North Pole, AK

<u>Azimuth</u> <u>(Degrees)</u>	<u>Relative</u> <u>Field</u>	<u>(dBk)</u>	<u>ERP</u> <u>(kW)</u>
0	0.300	1.30	1.35
10	0.350	2.64	1.84
20	0.415	4.12	2.58
30	0.475	5.29	3.38
40	0.530	6.25	4.21
50	0.620	7.61	5.77
60	0.700	8.66	7.35
70	0.780	9.60	9.13
80	0.880	10.65	11.62
90	0.950	11.32	13.54
100	0.990	11.67	14.70
110	1.000	11.76	15.00
120	0.985	11.63	14.55
130	0.950	11.32	13.54
140	0.880	10.65	11.62
150	0.800	9.82	9.60
160	0.710	8.79	7.56
170	0.615	7.54	5.67
180	0.530	6.25	4.21
190	0.465	5.11	3.24
200	0.416	4.14	2.60
210	0.350	2.64	1.84
220	0.300	1.30	1.35

TABLE 1.1 (cont'd)

<u>Azimuth</u> <u>(Degrees)</u>	<u>Relative</u> <u>Field</u>	<u>(dBk)</u>	<u>ERP</u> <u>(kW)</u>
230	0.290	1.01	1.26
240	0.310	1.59	1.44
250	0.330	2.13	1.63
260	0.350	2.64	1.84
270	0.360	2.89	1.94
280	0.380	3.36	2.17
290	0.385	3.47	2.22
300	0.380	3.36	2.17
310	0.360	2.89	1.94
320	0.350	2.64	1.84
330	0.330	2.13	1.63
340	0.310	1.59	1.44
350	0.290	1.01	1.26

Maximum ERP = 15.0 kilowatts = 11.76 dBk

